

Timothy J. Straub Managing Associate

timothy.straub@dentons.com D +1 212 768 6821 Dentons US LLP 1221 Avenue of the Americas New York, NY 10020-1089 United States

 Salans FMC SNR Denton McKenna Long dentons.com

March 4, 2021

MEMO ENDORSED

VIA ECF

The Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: Romero v. Barbell Apparel L.L.C.: Case No. 20-cv-08297-SHS

Dear Judge Stein:

We represent defendant Barbell Apparel L.L.C. ("Defendant") in the above-referenced matter. Together with counsel for Plaintiff, we jointly and respectfully move the Court to stay all case deadlines in this action for forty five (45) days. This requested adjournment will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

We thank the Court for its courtesies and consideration.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)

The initial conference is adjourned to June 10, 2021, at 10:00 a.m. If the stipulation of dismissal is filed before June 10, the conference will be cancelled.

Dated: New York, New York

March 4, 2021

SO ORDERED:

Sidney H. Stein, U.S.D.J.